

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Amy Elizabeth Krekelberg,

Civil File No. 13-cv-3562 DWF/TNL

Plaintiff,

v.

Anoka County, et al.,

Defendants.

**PLAINTIFF'S MOTION AND
PETITION FOR AN AWARD OF
REASONABLE ATTORNEYS' FEES
AND COSTS UNDER 18 U.S.C. § 2724**

As the prevailing party in Plaintiff's claims against Defendant City of Minneapolis, Defendant Mathew Olson, and Defendant Heather Young, Plaintiff Amy Elizabeth Krekelberg, by and through her undersigned co-counsel, bring this Motion and Petition in accordance with Rule 54(d) of the Federal Rules of Civil Procedure and Local Rule 54.3. Plaintiff hereby moves the Court for an order for attorneys' fees in the approximate amount of \$1,080,000.00 (excluding post-trial fees that will be included in Plaintiff's request when briefed) and costs in the approximate amount of \$ \$72,264.28 (excluding any post-trial costs that will be included in Plaintiff's request when briefed) under 18 U.S.C. Section 2724, which constitute approximate fees and costs incurred by Plaintiff in conjunction with her specific claims against Defendants City of Minneapolis, Mathew Olson, and Heather Young over the last five-plus years.

Per the Court's request, the parties are submitting a stipulated and proposed briefing schedule regarding this motion by joint letter, and Plaintiff will subsequently obtain an oral argument date if the Court so requests. Plaintiff's Motion is based on all files, records and proceedings herein, including Plaintiff's Memorandum of Law in

Support of Petition for Attorneys' Fees and the accompanying Affidavits and
Declarations which will be submitted in support of said Motion according to the briefing
schedule ultimately issued by the Court.

Dated: July 9, 2019

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